



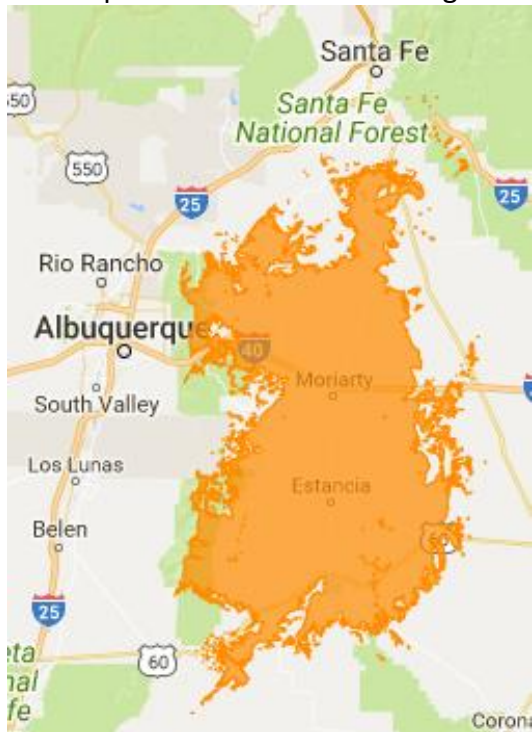
HIGHER SPEED
Internet

December 27, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
RE: GN Docket No.17-258

Dear Ms. Dortch:

Higher Speed Internet, www.higherspeed.net, is a small rural fixed wireless internet service provider located in "The East Mountains", east of Albuquerque, New Mexico. Higher Speed Internet has been in operation since 2002 and currently has approximately 580 subscribers across a large geographical footprint. The map below shows our coverage area.



We offer broadband speeds to our rural area from 1 Mbps by 768 Kbps up to 45 Mbps by 45 Mbps. The demographic of the consumers we serve are a reflection of the economically depressed state in which we live. A majority of our customers can barely afford to pay their electric bill, much less a broadband internet bill.

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Prior to 2015 Higher Speed Internet has made some investments into the 3.65 GHz spectrum with some success. We have invested over \$20,000 at one site alone.

Higher Speed Internet believes that auctioning Priority Access Licenses (PALs) for Partial Economic Areas (PEAs) will benefit the cellular telephone industry and be a detriment to the small business WISP industry. Higher Speed Internet is an extremely small business, not overflowing with capital (we churn every profit back into the ever changing technology that we use to deliver wireless broadband) and an investment like the one mentioned above in the 3.65 GHz spectrum is an extremely large risk we took.

We would consider larger investments in PALs to obtain protected "cleaner spectrum" if access to it remained as it currently is under the existing rules. Deploying more private capital in this spectrum means more deployment to unserved and underserved areas, faster speeds and lower costs to the economically depressed state we live in. As we all know greater speeds and lower costs to the end users can bring economically depressed states like the State of New Mexico, out of such depression.

We do not need such a large PEA to bid on. If that were the case we would need to purchase an excess amount of PAL areas that is much larger than the expanded area we desire to cover.

I hope you can clearly see that Higher Speed Internet opposes the adoption of larger PAL's and license terms. Larger PAL's and license terms will harm the ability of small business, wireless internet service providers, to provide the services we do where the ILECs, CLECs, cable companies and cellular companies refuse to go due to lack of population density.

Kindest Regards,

Steven Grabiell
President
Higher Speed Internet